of 18 years, in interstate commerce with the intent that the individual engage in any sexual

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activity for which a person can be charged with a criminal offense, that is: Sexual Assault, in violation of Colorado Revised Statute 18-3-402(1)(e), Unlawful Sexual Activity with a Minor, in violation of Utah Criminal Code 76-5-401 and Statutory Sexual Seduction, in violation of Nevada Revised Statute 200.368; all in violation of Title 18, United States Code, Section 2423(a).

DATED: this day of February, 2025.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

SUE FAHAMI

Acting United States Attorney

MEGAN LACHOW

Assistan United States Attorney